

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

CO-LEAD CLASS COUNSEL'S:
(1) MOTION TO COMPEL CORRECTIVE DISCLOSURES BY
PHILLIP TIMOTHY HOWARD, ESQUIRE (A/K/A DR. TIM HOWARD, J.D., PH.D.)
AND HOWARD & ASSOCIATES, P.A.;
(2) MOTION TO COMPEL MR. HOWARD, HOWARD & ASSOCIATES, P.A.; AND
CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, MR. HOWARD, AND
JEFF KAHN TO RESPOND TO RESPECTIVE DISCOVERY REQUESTS
PROPOUNDED UPON THEM; AND
(3) NOTICE TO THE COURT OF CERTAIN CONDUCT BY
MR. HOWARD AND HIS RELATED ENTITIES

Co-Lead Class Counsel submit this Motion seeking an Order compelling Phillip Timothy Howard, Esquire (a/k/a Dr. Tim Howard, J.D., Ph.D.), and Howard & Associates, P.A. to make corrective disclosures regarding the BAP Providers in the Settlement Program and an Order

compelling Mr. Howard, Howard & Associates, P.A. and Cambridge Capital Group, LLC, Gail Milon, Mr. Howard and Jeff Kahn to respond to the respective discovery requests propounded upon them by Co-Lead Class Counsel, on August 10, 2017, consistent with the Notice & Order issued by this Court on July 19, 2017. Pursuant to the MDL statute, 28 U.S.C. § 1407, Fed. R. Civ. P. 23(d) and the All Writs Act, 28 U.S.C. § 1651, and for the reasons stated in the accompanying Memorandum of Law, the Motion should be granted and the respondents should be ordered to provide full and complete responses to the discovery requests within five (5) days. Finally, Co-Lead Class Counsel seek to provide the Court with Notice of certain conduct by Mr. Howard and his related entities, so that the Court is fully informed and may take whatever action the Court deems appropriate, based upon a complete record.

Dated: September 12, 2017

Respectfully submitted,

/s/ Christopher A. Seeger

Christopher A. Seeger
SEEGER WEISS LLP
77 Water Street
New York, NY 10005
Phone: (212) 584-0700
Fax: (212) 584-0799
cseeger@seegerweiss.com

Co-Lead Class Counsel

Sol Weiss
ANAPOL WEISS
One Logan Square
130 N. 18th St. Ste. 1600
Philadelphia, PA 19103
Phone: (215) 735-1130
Fax: (215) 735-2024
sweiss@anapolweiss.com

Co-Lead Class Counsel

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing motion, along with the supporting documents, was served electronically via the Court's electronic filing system on the date below upon all counsel of record in this matter. Because neither Mr. Howard nor counsel for the Cambridge Respondents, Mr. Black, has entered his appearance in this action, they are being served via email and Federal Express Overnight Mail at the below addresses:

Phillip Timothy Howard
Howard & Associates
2120 Killarney Way, Suite 125
Tallahassee, FL 32309
Tim@howardjustice.com

Phillip Timothy Howard
Howard & Associates
8 Museum Way
Suite 2408
Cambridge, MA 02141

Martin L. Black
4909 N. Monroe Street
Tallahassee, FL 32303
Mbmblack8@gmail.com

Dated: September 12, 2017

/s/ Christopher A. Seeger
Christopher A. Seeger